AMENDMENTS TO THE DRAWINGS:

Enclosed herewith is a Replacement Sheet depicting FIG. 4, which has been amended to delete the reference number 55.

REMARKS

Claims 1-9 are pending. Claims 1-4 and 7 have been amended. The abstract in the specification and FIG. 4 in the drawings have been amended to correct minor typographical errors. Applicants respectfully request reconsideration of the application in response to the non-final Office Action.

Claim Objection

Claim 9 has been objected to for informalities because claim 9 cannot depend from itself. Applicants note that the appropriate correction was previously made in the Preliminary Amendment, filed on November 6, 2003, in which claim 9 was amended to change its dependency to claim 7. Accordingly, Applicants respectfully request that the objection to claim 9 be withdrawn.

Claim Rejection – 35 U.S.C. §102

Claims 1 and 4-7 have been rejected under 35 U.S.C. §102(e) for allegedly being anticipated by U.S. Patent No. 6,636,587 to Nagai et al. ("Nagai"). Applicants traverse the rejection for at least the following reasons.

Independent claim 1, as amended, recites:

> A third-party call control type simultaneous interpretation system, comprising:
>
> a CTI (Computer-Telephony Integration) board for establishing a traffic channel between a talker and a listener;
>
> a CTI control module for generating an event in response to a button signal input through the CTI board to control the CTI board as a job unit comprising CTI control functions for performing a basic telephone action;

an interpretation module for recognizing a voice of the talker/listener input through the CTI board and translating the voice into a predetermined language; and

a main control module for controlling an action of the CTI control module in accordance with a predetermined interpretation scenario that defines basic telephone actions to be executed at a next state in response to events generated at a current state.

Applicants submit that Nagai does not teach each and every element of independent claim 1. In particular, Nagai does not teach "a main control module for controlling an action of the CTI control module in accordance with a predetermined interpretation scenario that defines basic telephone actions to be executed at a next state in response to events generated at a current state."

The specification of the instant application provides that, in one embodiment, a main control module 570 controls the general operations related to an interactive simultaneous interpretation service based on an interpretation scenario. (Specification at page 8, line 29 – page 9, line 1). For example, FIG. 6 illustrates an exemplary interpretation scenario, which defines, beforehand, actions that should be executed at a next state in response to events generated at a current state. (Specification at page 9, lines 9-14). In this example, the interpretation scenario is formulated in tables in the format of <current state, event, action>, where the "current state" describes a currently operating state, the "event" describes a generated event, and the "action" describes an action that should be performed at the next state in response to the generated event. (Specification at page 9, lines 15-21). In this way, the action necessary for the next state can be immediately performed regardless of what events are generated from the talker 100 and the listener 300 so that smooth communication between the talker 100 and the listener 300 who use different languages can be made. (Specification at page 10, lines 9-13).

Nagai describes a CTI system 100 which routes information from a sending side to a receiving side and, when the expression format of information on the sending side is different from the expression format of information on the receiving side (e.g., due to a difference in media, such as a telephone on the sending side and a facsimile machine on the receiving side), the CTI system 100 converts the expression format automatically so that information on the sending side can be used by the receiving side. (Nagai at col. 6, lines 52-67). Nagai teaches that the CTI system 100 includes a CTI server 300, having various exclusive-use information processing boards. (Nagai at col. 8, lines 53-56). Nagai further teaches that a group of programs are added to a program memory 318 for carrying out respective functions of the exclusive-use processing boards of the CTI server 300, and that a system execution management program 317 manages execution of the program group, as shown in FIG. 3. (Nagai at col. 8, lines 53-56).

Nowhere does Nagai teach that the system execution management program 317 manages execution of the program group in accordance with a predetermined interpretation scenario, as suggested by the Office on page 3 of the Office action. Further, Applicants submit that Nagai does not teach "a predetermined interpretation scenario that defines basic telephone actions to be executed at a next state in response to events generated at a current state," as recited in amended claim 1.

In FIG. 12, Nagai illustrates a table used by a telephony agent program 311 to judge the necessity of media conversion. (Nagai at col. 20, lines 59-65). FIG. 12 illustrates correspondence in classification of media conversion in accordance with differences in sending/receiving means. For example, if the sending means is a facsimile machine and the receiving means is a telephone, the classification of

conversion shown in FIG. 12 indicates that the telephony agent program 311 is to execute an image-to-voice conversion. The classification of conversion shown in FIG. 12 of <u>Nagai</u> does not, however, define basic telephone actions to be executed at a next state in response to events generated at a current state. For example, the identified conversions (e.g., text-to-voice conversion, image-to-voice conversion, etc.) shown in FIG. 12 of <u>Nagai</u> do not describe the basic telephone actions, recited in claim 1. Additionally, the classification of the sending/receiving means (e.g., telephone, facsimile, etc.) shown in FIG. 12 of <u>Nagai</u> does not define an event, which is generated in response to a button signal input through the CTI board to control the CTI board as a job unit comprising CTI control functions for performing a basic telephone action, as recited in claim 1.

Accordingly, for at least these reasons, Applicants submit that <u>Nagai</u> does not anticipate claim 1. Thus, Applicants respectfully request that the rejection under 35 U.S.C. §102(e) of independent claim 1, and of claims 4-6, which depend therefrom, be withdrawn. Further, for reasons analogous to those presented for claim 1, Applicants submit that <u>Nagai</u> does not anticipate claim 7. Thus, Applicants respectfully request that the rejection under 35 U.S.C. §102(e) of independent claim 7 be withdrawn.

Claim Rejection – 35 U.S.C. §103(a)

Claims 2, 3, 8 and 9 have been rejected under 35 U.S.C. §103(a) for allegedly being unpatentable over <u>Nagai</u> in view of U.S. Patent No. 6,286,033 to Kishinsky et al. ("<u>Kishinsky</u>"). Applicants traverse the rejection for at least the following reasons.

For at least the same reasons presented herein with respect to independent claim 1, Applicants submit that claims 2 and 3, which depend therefrom, are patentable over Nagai and that Kishinsky does not supply, and is not purported to supply, the teachings missing from Nagai. At a minimum, neither Nagai nor Kishinsky teaches or suggests "a main control module for controlling an action of the CTI control module in accordance with a predetermined interpretation scenario that defines basic telephone actions to be executed at a next state in response to events generated at a current state," as recited in parent claim 1. Thus, Applicants respectfully request that the rejection under 35 U.S.C. §103(a) of claims 2 and 3 be withdrawn.

Further, for analogous reasons, Applicants submit that claims 8 and 9, which depend from claim 7, are also patentable over Nagai and that Kishinsky does not supply, and is not purported to supply, the teachings missing from Nagai. At a minimum, neither Nagai nor Kishinsky teaches or suggests "an interpretation transmission step of controlling the CTI board in accordance with the interpretation scenario and transmitting the translated voice to the other party in accordance with the interpretation scenario, wherein the predetermined interpretation scenario defines basic telephone actions to be executed at a next state in response to events generated at a current state," as recited in parent claim 7. Thus, Applicants respectfully request that the rejection under 35 U.S.C. §103(a) of claims 8 and 9 be withdrawn.
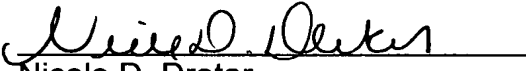
Conclusion

It is believed that this Amendment does not require additional fees. However, if additional fees are required for any reason, please charge Deposit Account No. 02-4800 the necessary amount.

In the event that there are any questions concerning this paper, or the application in general, the Examiner is respectfully urged to telephone Applicants' undersigned representative so that prosecution of the application may be expedited.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

Date: <u>August 6, 2007</u>   By: _____

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